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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11

12 **In the Matter of the Seizure of:**

13
14 Any and all funds held in Republic Bank of
15 Arizona Account(s) xxxx1889, xxxx2592,
16 xxxx1938, xxxx2912, and, xxxx2500.

CASE NO. 2:18-cv-06742-RGK (PJW)

17 [RELATED CASES

2:18-cv-08423; 2:18-cv-08551;
2:18-cv-08555; 2:18-cv-08556 ;
2:18-cv-08565; 2:18-cv-08566 ;
2:18-cv-08568; 2:18-cv-08569;
2:18-cv-08570; 2:18-cv-08577;
2:18-cv-08578; 2:18-cv-08579;
2:18-cv-08588; 2:18-cv-08592;
2:18-cv-08723; 2:18-cv-08730;
2:18-cv-08747; 2:18-cv-08748;
2:18-cv-08749; 2:18-cv-08750;
2:18-cv-08753; 2:18-cv-08754;
2:18-cv-08759; 2:18-cv-08760;
2:18-cv-08763; 2:18-cv-08764]

23 **NOTICE OF INTENT TO FILE**
24 **DECLARATION OF PAUL**
25 **CAMBRIA AND SUPPORTING**
26 **EXHIBITS UNSEALED**
27
28

1 On September 20, 2018, movant James Larkin filed an Application for
 2 Permission to File Under Seal (Doc. 60), in which he sought leave to file under seal
 3 the concurrently filed Declaration of Paul J. Cambria and its supporting exhibits (Doc.
 4 61), two of which the government has claimed to be work product. In an Order
 5 dated October 4, 2019 (Doc. 101), the Court denied Mr. Larkin's application pursuant
 6 to Local Rule 79-5.2.2(b), "because the government . . . did not timely file a
 7 declaration establishing the need to seal the document."

8 Under Local Rule 79-5.2.2(b), if the Court denies an application to file under
 9 seal, "the Filing Party may file the document in the public case file (i.e., unsealed) no
 10 earlier than 4 days, and no later than 10 days, after the Application is denied, unless
 11 the Court orders otherwise." To date, the government has made no filing with the
 12 Court seeking reconsideration of the denial of Mr. Larkin's application to seal or
 13 seeking to independently seal the documents.

14 Mr. Larkin hereby provides notice that, in accordance with Local Rule 79-
 15 5.2.2(b), he will re-file the Declaration of Paul J. Cambria and its supporting exhibits in
 16 the public case file (i.e., unsealed) on or after 4:00 p.m. on Tuesday, October 15, 2019,
 17 unless the government makes a filing before then seeking an Order sealing those
 18 documents.¹

19 Respectfully submitted,

20
 21 DATED: October 11, 2019

BIENERT | KATZMAN PC

22
 23 /s/ Thomas H. Bienert, Jr.
 24 Thomas H. Bienert, Jr.
 25 Whitney Z. Bernstein
 26 *Attorneys for James Larkin*

27 ¹ Under Fed. R. Crim. Pro. 45(a)(1), Monday, October 14, would be the end of the ten-day period,
 28 except for the fact that it is the Columbus Day holiday, which extends the period through the end of
 the following day, October 15, 2019.

CERTIFICATE OF SERVICE

I certify that on this 11th day of October, 2019, I electronically transmitted a PDF version of this document to the Clerk of the Court, using the CM/ECF System, for filing and for transmittal of a Notice of Electronic Filing to the following CM/ECF registrants listed below.

/s/ Toni Thomas
Toni Thomas

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